

Mobility & Access Committee for Scotland

Response to the Department for Transport's consultation exercise on Improving Access to Taxis.

Questions in the consultation document:

1. What is your view of the analysis and data included here and in the Impact Assessment? Do you have any further, or more accurate data that you would be able to send us?

MACS agree that the need for Government action in this area is long overdue.

Scottish Government Transport Directorate statistics for the three year period 2004-05 – 2007-08 show an increase in the number of 'wheelchair accessible taxis' from 2,563 to 4,461, an increase of 1,898. The total number of licensed taxis rose from 9,538 to 10,441 over the same 5 year period, an increase of 903. The percentage of 'wheelchair accessible taxis' went up from 37% to 43%. Edinburgh, Glasgow, East Lothian, Midlothian and South Ayrshire have achieved 100%. There has been marked growth in Renfrewshire which has achieved 80%. Elsewhere only West Dunbartonshire has exceeded 50%. The number in many areas remained low or even declined.

The then Scottish Executive produced figures in 2006 which showed that there were 10,244 licensed private hire cabs in existence, only a very small number of which (exact figures not available) were wheelchair accessible.

Other policies featured a wide range of requirements, including 100% wheelchair accessibility by a certain date. Research by Reid-Howie Associates for the then Scottish Executive in 2004 found that 16 had a specific policy, the approach from 8 of them being to require all new licensed vehicles to be wheelchair accessible. Those without policies were waiting for regulations and guidance.

In 2007 MACS undertook a survey of 'Taxicard' fare concession schemes in Scotland as an adjunct to a Policy Statement on 'Travel by Taxis and Private Hire Cars'. This showed that:

- out of 32 local authorities only 14 operated such schemes and no authority in the former Strathclyde region had one
- there were 37,903 registered users in the schemes in 2004, increasing to 48,081 in 2006
- total journeys undertaken in 2004/5 numbered 826,753 and in 2006/7 899,912 but not all authorities recorded this data
- take up was generally below the journey entitlement, the annual average in 2006/7 being 22 journeys
- the total cost to the authorities in 2004/5 (where recorded) was £2,778,71, rising in 2006/7 to £3,118,163.

The survey noted that there were significant differences between schemes in terms of eligibility, the number of journeys allowed and the degree of concession offered, all of which affected the number registered, the number of journeys undertaken and the cost to the authorities. There were also differences in the number, type and scale of taxi and private hire vehicles available and in other services provided in the area such as dial-a-ride, dial-a-bus and CT minibus services. Finally, the survey revealed shortcomings in data on the use on these schemes and the need for more information to evaluate their cost effectiveness in terms of users' mobility and benefits.

2. What do you think are the potential impacts, costs and benefits of the “do nothing” scenario?

MACS does not believe that this is a viable option. Doing so would make access to taxis worse, not better. There would be no benefits and it is likely that the number of taxis would decrease.

3. Do you have any further or more accurate data on potential costs and benefits of a “do nothing” scenario that you would be able to send us?

The costs and benefits of doing nothing can be extrapolated from some of the statistical information taken from MACS previous survey on the Taxicard scheme provided in the response to Q1. If you wish further information on the survey on the Taxicard scheme, please contact the MACS Secretariat at macs@scotland.gsi.gov.uk.

4. What type of guidance would be most effective, in what format should it be produced, and what can the DfT do to promote take-up?

In November 2006 DfT issued 'Taxi and Private Hire Vehicle Licensing: Best Practice Guidance' which encouraged local authorities to introduce taxi accessibility policies pending regulation under the DDA. The former Disability Rights Commission published 'A Practical Guide for Taxi and Private Hire Services' as one of a series of useful guidance documents on transport modes. These guidance documents are still valuable, and it would be helpful to produce any new guidance using a similar approach.

5. What do you think of the draft technical specification? Do you think that it would help to improve levels of accessibility? Which aspects of it could be delivered easily, and which ones would be problematic?

The initial specification is broadly based on existing design needs and will require no modification for a majority of vehicles. It would be simple and quick to introduce and could deliver 30,000 compliant vehicles over the next 10 years. Additions to the specification need to be considered such as those concerned with safety standards, an intermediary step and a swivel seat. Lifts would reduce driver strain and increase accessibility. It is suggested that two specifications may be required, one for taxis and the other for private hire vehicles.

6. What do you think are the advantages and disadvantages of DfT funded demonstration schemes?

MACS would be broadly in favour of these in addition to regulation, and think that taxi companies would be more likely to take note if such schemes were DfT-led.

However, the proposals appear to be too small in scale and need to be greatly expanded in order to be effective. There should be at least two in Scotland in different local authorities offering different demographics, as the needs of urban and rural areas are likely to be different and they should be planned and run with the involvement of disabled people and a wide range of agencies. Local access panels should be closely consulted. The schemes should embrace not only taxis but private hire and community transport services, and demonstrate how they can be coordinated and integrated into mainstream transport provision. Evaluation of outcomes in terms of user benefits is very important before the demonstration schemes are taken further. It is thought that the demonstration schemes would provide an ideal opportunity to try out a number of taxis constructed to the Enhanced Specification.

7. What do you think would be the most effective ways of influencing action by local licensing authorities, drivers and manufacturers?

Clear, positive, financial incentives should be provided, for example, increased capital allowances, to help drivers and operators to purchase vehicles that meet accessibility standards. A reduction in VAT on such vehicles would assist this.

Mandatory training for drivers should be provided free of charge. Regulation needs to go beyond technical specifications and include licensing authorities, drivers and manufacturers. There should be more encouragement and financial assistance where required to encourage the production of co-ordinated transport plans by local authorities and transport operators.

MACS also considers that user-side measures, such as fare subsidies through 'Taxicard' schemes, supports both the taxi trade and other transport providers by making services affordable and thus enabling disabled people to travel more. They benefit from greater mobility, attain greater social inclusion and gain better access to community services and facilities.

8. What are your views on the Government's proposal to amend and commence section 36 of the Disability Discrimination Act? This would impose a duty on drivers of taxis and private hire vehicles that are designated as being wheelchair accessible to assist passengers in wheelchairs, to carry them in safety and comfort and to not charge them any extra.

Drivers should have a statutory duty to assist passengers in wheelchairs and not charge extra. But this should only be if requested by the passenger or the passenger's companion. Any training (which should be thorough) should take account of this. Clarification and guidance will also be needed on what is reasonable for a driver to undertake and where assistance starts and finishes.

MACS would prefer that assistance should be door to door. There should be better co-ordination with other areas of enforcement.

It may be that such measures would lead to more applications from drivers for exemption on health grounds or unwillingness to accept bookings from disabled people requiring higher levels of assistance.

9. What additional enforcement action or tools would be the most effective ways of improving driver behaviour and attitudes?

Mandatory training should be provided without charge on first licensing, re-licensing and at regular intervals, free of charge plus expenses/loss of earnings.

10. What measures do you think could act as positive incentives to improve driver behaviour and the levels of service offered to disabled people?

There could be further powers to issue fixed penalty notices although this would involve amending Part V of Disability Discrimination Act 1995.

Disabled people should be involved in the planning and delivery of the training (mentioned in the response to Q9) perhaps via local access panels.

Reward scheme whereby drivers display a participation notification in their window and financial incentives (VAT/tax concessions) for anything undertaken that complies with good accessibility should be rolled out.

DfT could also publish list of LAs who have taken a positive or creative approach to solutions in relation to what is available in relation to training/service delivery/vehicle developments

11. In relation to improving access to taxis, what do you think the DfT and local licensing authorities could do better or more effectively?

Provide strong positive incentives for drivers to be involved in training and to improve/upgrade the fleet. Taxis and private hire vehicles have an important role to play and must receive greater prominence in central and local government policies, strategies and action plans.

DfT must work closely with the Scottish Government to set the policy agenda based on thorough consultation, sound research and accurate data. Likewise local authorities and their various departments should measure the nature and extent of existing provision (including a wide range of DRT and other relevant services), establish unmet needs, produce action plans and assess outcomes on a continuing basis. This would of course involve extra public spending.

The ECMT report is right to stress the importance of infrastructure for the effective delivery of taxi services. The positioning of taxi ranks, better information and dropped kerbs are important.

12. How could we help to increase the availability of accessible taxis and private hire vehicles at ports, airports, bus and rail stations?

The journey that a disabled person makes should be charted from the moment they leave their home until they arrive at their destination, in order to accurately examine how best to improve the entire experience. The ability to transfer between transport modes is vital if people are to be able to plan and complete whole journeys. So the provision of accessible and affordable taxis at these interchanges is essential and so is the availability of information about them. The port authorities, ferry operators, bus and train operators should be encouraged to provide information about accessible taxis on their websites.

To achieve a fully integrated transport system, transport intersections should have conveniently located taxi ranks served by wheelchair accessible vehicles and there should be a legal requirement on operators for these taxi ranks to be served by a number of accessible taxis.

13. How could we improve the consistency and quality of information provided to disabled people about taxis?

A package of standard information should be given to all LAs re training/importance of taxis in lives of those with disabilities in accessing other transport links. Operators of all ports, ferries, airports, bus and rail stations should be required to provide information on their websites and in other information provided by them on how to contact an accessible taxi operator. If no accessible taxi operator is likely to be available (e.g. at an unmanned stations and ferry landing stages) this fact should be clearly stated and brought to the attention of the passenger at the earliest possible stage, if possible before travel arrangements for the journey are made.

The provision of pre-journey information, advice about services and how to raise issues and complaints, should be a legal or contracted requirement on transport operators.

Additional DfT guidance on these matters would be helpful and operators should contact disability groups for advice, especially local access panels.

14. What do you think are the potential impacts, costs and benefits of a proactive programme of DfT-led initiatives?

Initiatives are not enough on their own and a full equalities impact assessment should be undertaken to ascertain the benefits of improved social integration, participation in sport and recreation and consumer spending by disabled people. Regulation will however be necessary in addition to a proactive programme.

15. Do you have any further or more accurate data on potential costs and benefits of a programme of DfT-led initiatives that you would be able to send us?

See the study 'Improved Public Transport for Disabled People' commissioned by the then Scottish Executive in 2005/6 (Research Findings N0 220/2006) especially its key findings on page 5.

16. What do you think about the draft technical specification?

In addition to the response to Q5, the date for meeting the proposed Interim Standard should be brought forward from 2025 to 2020. The date for meeting the Enhanced Standard will depend on the speed with which vehicles can be designed and produced which meet it.

17. What do you think are the potential impacts, costs and benefits of a regulation?

Further to the response to Q8, MACS believes that regulation needs to be pursued along with greater investment in accessible transport for disabled people and encouraging integrated co-ordinated transport schemes. Regulation should include private hire vehicles as well as taxis. As far as possible there should be a level playing field between taxis and private hire vehicles.

The assumptions in the Impact Assessment on the purchase and use of vehicles and on the cost of compliance need to be reassessed to take account of information provided by taxi operators and others.

18. Do you have any further or more accurate data on the potential costs and benefits of a regulation that you would be able to send us?

Please see the responses to Q1 and Q5.

19. How do you think that a technical standard should be enforced?

The technical specification should be laid down as a minimum national standard and implemented under the DDA. It should be enforced by local authority officers and the police.

General

Although the consultation is about physical access, MACS must stress the importance of training for all drivers in other disability issues e.g. dealing with people with sensory disabilities and those travelling with assistance dogs.

Judith Ballantine
MACS Secretary
22 April 2009